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FCC Gettysburg, PA

From: Andreas ZIemann 7623 SW Leland Dr Aloha, OR 97007

RE: RM-11828

Dear FCC,

I am against the changes proposed in RM-11828, currently sitting for review before final action taken upon it.

As an ARRL Volunteer Examiner (VE) since 2005, most of the folks taking the Technician class license exam take it for other purposed than eventual upgrade to General class or above.

I've seen engineering students take the Technical class exam as part of a class cube sat project. I see lots of Civilian Emergency Response Team (CERT) members take it for enhanced VHF/UHF communications beyond the FRS / GMRS / CB radio capabilities already available. I see 'Boaters' take Technician class exam with immediate subsequent General Class upgrade to access 'free' wireless HF based email services. I've seen other folks take the Technician class exam as part of a 'job' requirement for potential emergency communication needs.

I suspect about 2 or 3 percent of what I have seen passing the Technician class exam, upgraded to General class, due to a serious interest in expanded HF privileges. Technician class privileges seem sufficient for 97 percent of those getting licensed. This is proof that the current system is working – those who desire to upgrade do.

Those new or prospective folks interested in expanded privileges beyond Technician class can easily upgrade to General class by answering 26 of 35 element 3 exam questions. In fact, in my time as a VE quite a few who passed the element 2 exam, opted to take the element 3 exam when offered, and a surprising number managed to pass, and most managed to get 20-25 element 3 questions correct. I do not subscribe to the consensus at ARRL that the current element 3 exam is a significant hindrance to those who really are interested in expanding their horizons within the Amateur Radio Service.

The proposed expanded Technician class privileges are enormous, and will in all likelihood be a disincentive for many to upgrade to General class. Again, only those

who really become interested in Amateur Radio Service beyond their original reason for joining will likely upgrade.

Previously it was argued that the one time element 1, 5 words per minute, Morse code exam was 'the' impediment to HF for access to expanded HF privileges offered in the General class. 5 wpm Morse code was the original requirement in 1912 to be an amateur radio operator. Now we are told, lack of expanded HF privileges in the Technician class is 'the' impediment to amateur radio operators wanting to 'explore' HF.

The ARRL, who filed this motion, desires increased ARRL membership. The elimination of element 1 was really about such increase in membership. Its failure brings us to Docket RM-11828. I doubt this action will lead to increased ARRL membership, when elimination of element 1 failed to do so. I am an ARRL member and joined as a newly minted Technician, but full HF privileges was always my ultimate goal, and element 1 in 2014 did not stop me from achieving my goal.

Current Technician class privileges are sufficient to 'wet' a new inexperienced in amateur radio operator. Spending some time at VHF/UHF in traffic nets, and actually handle traffic, explore digital modes at HF, hang out with experienced HF operators and their stations, such as ARES operators at an Emergency Operations Center (EOC), or with Amateur Radio Contest groups, who are always willing to introduce new amateurs to Radio Sport. Additional options to those stated exist.

Expanded 'digital' mode privileges for Technician class along the lines of current CW allocations within Technician class, is perhaps acceptable. But the never-ending Technician class privileges expansion line must stop somewhere. Otherwise, the FCC might as well create a single license class now.

Amateur radio operators in the Amateur Radio Service, who desire expanded HF privileges, have sufficient incentive to do so currently. Those who do not, can remain Technician class and explore all it has to offer, which is quite a bit.

Again, I am against the approval of docket RM-11828.

Sincerely Yours,

Andreas Ziemann KE7AUB NTS / ARES / VE / QSL Manager / Radio Sport Junkie / DX'er